

October 31, 2018

Peter Freedman  
AuPt Industries LLC  
P.O. Box 1424  
Edwards, CO 81632



**COLORADO**  
Division of Reclamation,  
Mining and Safety  
Department of Natural Resources

1313 Sherman Street, Room 215  
Denver, CO 80203

**RE: West Side Placer, File No. M-2016-081 , Technical Revision (TR-1) Adequacy Review-2**

Dear Mr. Freedman:

On October 26, 2018, the Division received your response to the preliminary adequacy review of TR-1 sent on September 4, 2018. Based on information provided in your response the Division requires additional information.

### **Remaining Adequacy Issues for TR-01**

#### **1. Mining Plan**

c. Pursuant to Rule 6.3.3(2)(a), describe the chemical types, quantities and concentrations to be utilized, chemical storage and spill containment and emergency response plans for onsite spills. Specify the tank capacities and operating solution volumes. The description of chemicals to be used or stored on site shall include the Material Safety Data Sheet (MSDS) for each chemical, if available. Locate and label any/all chemical storage, use, and disposal facilities on the updated Mine Plan Map in accordance with Rule 6.3.3(1)(m).

Quantity is not addresses. State the maximum amount of dry flocculant to be stored on site at any given time. How much is added to the mixing tank to achieve a concentration of 1 ppm? How often does additional flocculant need to be added, does this require new water or additional chemical to maintain a specific concentration?

What is your emergency response plan for onsite spills? This should adhere to Rule 3.1.13 and the MSDS Section 6

The flocculant holding tank is not adjacent to the thickener, how is liquid transferred between tanks to avoid spills?

#### **2. Reclamation Plan**

b. Pursuant to Rule 6.3.4(1)(e), specify the reclamation treatment and disposal of all chemicals and waste products. Pursuant to Rules 3.1.5(5), (10), (11), and 3.1.6, describe how the chemicals and waste products will be disposed in a manner protective of hydrologic resources. Locate and label onsite disposal locations for all processing chemicals and waste products on the updated Reclamation Plan Map.

How will left over dry flocculant be disposed of?



**Additional Adequacy Issues for TR-01**

3. MSDS Section 7 states this material is safe to store in well ventilated areas at ambient temperatures. The revised mining plan states storage in Conex which gets hot and has little air flow. Explain how this is an acceptable means of storage.
4. MSDS Section 7 states this material is incompatible with strong oxidizing agent. Furthermore MSDS Section 10 states oxidizing agent may cause exothermic reactions. Will this material be mixed with any other chemicals? Or stored in close proximity to strong oxidizing agents?
5. MSDS Section 13 requires disposal in approved chemical landfill including empty containers. Include this disposal information in the reclamation plan.

Please respond to these preliminary adequacy issues by November 1, 2018. If the Operator needs additional time to respond please request an extension to the November 1, 2018 decision deadline.

Response to this correspondence should be directed to Amy Yeldell at the Division of Reclamation, Mining and Safety, 1313 Sherman St., Room 215, Denver, CO 80203. Direct contact can be made by phone at 970-254-8511 or via email at amy.yeldell@state.co.us

Sincerely,



**Amy Yeldell**

Environmental Protection Specialist

Ec:

Wally Erickson, Senior EPS, Grand Junction DRMS

Philip Courtney, Colorado State Land Board